

OFFICE OF ADVOCACY  
U.S. SMALL BUSINESS ADMINISTRATION

July 10, 2000

*Sent via e-mail*

Esther Dyson  
Chairman  
Internet Corporation for Assigned Names and Numbers  
4676 Admiralty Way  
Suite 330  
Marina del Rey, California 90292

Re: Introduction of New gTLDs

Dear Ms. Dyson:

The Office of Advocacy, U.S. Small Business Administration, thanks you for this opportunity to comment on ICANN's consideration of expanding the domain name space by adding new general Top Level Domains ("gTLDs"). Our positions are consistent with our comments filed on January 10, 2000, April 4, 2000, and April 14, 2000. In short, they are.

- (1) The need for new gTLDs is real and substantial. There is a difference between technically feasible and commercially viable domain names. While there are many technically feasible names remaining in .com, names that have high numbers of characters are not viable in a competitive marketplace.
- (2) The introduction of new competitive gTLDs is good for the Internet. It will encourage efficiency and innovation. While there may be some consumer confusion at first, the new registries will have sufficient incentive to raise consumer awareness.
- (3) ICANN should maintain the stability of the Internet throughout the introduction of new gTLDs.
- (4) ICANN should expand the domain name space in a measured and responsible fashion that is systematic and ultimately limited by what the market can bear. ICANN should not place an arbitrary limit on the total number but rather allow the number of applicants or technical feasibility to do so.

- (5) Advocacy supports the use of a test-bed of a limited number of new gTLDs. However, that test-bed should be large enough to provide ICANN with enough information to continue the introduction of gTLDs after the test-bed is completed. Advocacy supports Working Group C's determination that 6 to 10 new domains are sufficient. In order to obtain the necessary variety, Advocacy supports a number of test-bed gTLDs at the higher end of this range. This will give ICANN experience in a variety of circumstances, including domains that are designated using non-roman characters.
- (6) For the test-bed to truly be a test, ICANN must have a specific deadline to when the test-bed ends. That deadline can be flexible as long as it is measurable and predictable.
- (7) ICANN should commit to the continued introduction of new gTLDs pass the test-bed. This commitment is necessary to prevent speculation and other scarcity issues.
- (8) ICANN should not act as a conduit, either through its actions or through sanctioning private action, for the expansion of trademark rights beyond those currently existing at law
- (9) ICANN should use as light a hand as possible in overseeing the gTLDs. ICANN should insure the technical stability of the Internet, while allowing the registries develop as they see fit. The decision of whether to be open or chartered and how to enforce that charter should be left up to the registry.

Thank you for considering these views. Please contact us if we can provide any more information on U.S. small business use of the Internet and domain names. We wish you the best of luck in your considerations in Yokohama.

Sincerely

/s/ \_\_\_\_\_

Eric E. Menge  
Assistant Chief Advocate  
for Telecommunications